

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03 MDL 1570 (RCC)
ECF Case

This document relates to:

Kathleen Ashton, <i>et al.</i> - against - Al Qaida Islamic Army, <i>et al.</i>	03 CV 6977 (RCC)
Ernesto Barrera, <i>et al.</i> - against - Al Qaeda Islamic Army, <i>et al.</i>	03 CV 7036 (RCC)
Thomas Burnett, Sr., <i>et al.</i> - against - Al Baraka Investment & Development Corp., <i>et al.</i> ,	03 CV 5738 (RCC)
Gladys H. Salvo, <i>et al.</i> - against - Al Qaeda Islamic Army, <i>et al.</i>	03 CV 5071 (RCC)
Walter Tremsky, <i>et al.</i> - against - Osama bin Laden, <i>et al.</i>	03 CV 7300(RCC)

**AFFIRMATION OF ANDREA BIERSTEIN IN OPPOSITION TO SULTAN BIN ADBULAZIZ AL-SAUD'S
MOTION TO DISMISS CERTAIN CONSOLIDATED COMPLAINTS**

Andrea Bierstein, Esq., affirms as follows:

1. I am an attorney admitted to practice in New York and in this Court and am a member of the law firm Hanly Conroy Bierstein & Sheridan LLP, co-counsel for the *Burnett* plaintiffs. I submit this affirmation to transmit to the Court the following documents submitted in opposition to the motion to dismiss filed by defendant Sultan bin Abdulaziz al-Saud in certain of the consolidated actions in this proceeding:

2. Exhibit 1 to this Affirmation is a true and accurate copy of material printed from the Saudi Arabian Embassy website on May 13, 2004.

3. Exhibit 2 is a true and accurate copy of an article entitled "Saudi Exile Warns More Attacks Are Planned," that appeared in the *New York Times* on July 11, 1996.

4. Exhibit 3 is a true and accurate copy of a *fatwa* entitled "Declaration of War Against the Americans Occupying the Land of the Two Holy Places," issued by Osama bin Laden in 1996.

5. Exhibit 4 is a transcript of a CNN interview with Osama bin Laden in 1997.

6. Exhibit 5 is a true and accurate copy of a *fatwa* issued by Osama bin Laden in 1998.

7. Exhibit 6 is a true and accurate copy of an Internet news item reporting on a *fatwa* issued by Sheikh Omar Abdel Rahman in 1998.

8. Exhibit 7 is a true and accurate copy of an article entitled "Bin Laden's Terrorism Career Began Fighting Soviet Union," that appeared in the *Washington Times* on September 13, 2001.

9. Exhibit 8 is a true and accurate copy of an article entitled "Saudi Elite Linked to OBL Financial Empire," that appeared in the *Boston Herald* on October 14, 2001.

10. Exhibit 9 is a true and accurate copy of an article entitled "Funds for Terrorists Traced to Persian Gulf Businessmen," that appeared in the *New York Times* on August 14, 1996.

11. Exhibit 10 is a true and accurate copy of an article entitled "Global Network Provides Money," that appeared in the *Washington Post* on August 3, 1993.

12. Exhibit 11 is a true and accurate copy of a report entitled "Terrorism Financing," Report prepared for the President of the Security Council United Nations and dated December 19, 2002.

13. Exhibit 12 is a true and accurate copy of an affirmation executed by Charles Pasqua on December 15, 2003, accompanied by an English translation.

14. Exhibit 13 is a true and accurate copy of an excerpt from a book entitled *The Age of Sacred Terror* by Daniel Benjamin and Steven Simon.

15. Exhibit 14 is a true and accurate copy of an article entitled "Saudi Money Aiding Bin Laden," that appeared in *USA Today* on October 29, 1999.

16. Exhibit 15 is a true and accurate copy of an article entitled "FBI List Boosted Donations to Bin Laden," that appeared in *USA Today* on November 4, 1999.

17. Exhibit 16 is a true and accurate copy of an op-ed piece by Turki al-Faisal bin Abdulaziz al-Saud that appeared in the *Washington Post* on September 17, 2002.

18. Exhibit 17 is a true and accurate copy of a July 31, 2003, statement of Jonathan Winer to the Senate Committee on Governmental Affairs.

19. Exhibit 18 is a true and accurate copy of an August 9, 2000 article from the *Philippine Daily Inquirer* entitled "Bin Laden Funds Abu Sayyaf Through Muslim Relief Group."

20. Exhibit 19 is a true and accurate copy of a report of a hearing before the Committee on International Relations of the House of Representatives.

21. Exhibit 20 is a true and accurate copy of a news report from the BBC Online entitled "U.S. fears terrorist attack in Kosovo," dated April 3, 2000.

22. Exhibits 21, 22, 23 and 24 are true and accurate copies of excerpts from *The Muslim World*, dated January 22, 1996, July 1, 1996, July 26, 1999, and October 20, 2000, respectively.

Affirmed in New York, New York on May 14, 2004.



Andrea Bierstein